

# EXHIBIT A

Friday, May 31, 2024 at 16:40:46 Eastern Daylight Time

---

**Subject:** FW: FWC - Actum PPT  
**Date:** Monday, May 20, 2024 at 10:34:24 AM Eastern Daylight Time  
**From:** Hunter Shkolnik  
**To:** Campbell, James M., molsen@mayerbrown.com  
**CC:** Corey Stern, Paul Napoli, Patrick Lanciotti  
**Priority:** High  
**Attachments:** 2022.01.27 Actum Presentation Attachment (Stamped)[7].pdf

Dear Mike & Jim,

I have now had the opportunity to review the Actum Power Point produced *in camera* to Judge Levy which has now been referenced in the Court's Show Cause Order. I will not comment on the outrageous nature of the project and simply will focus on the inappropriate confidentiality designation. To be clear, there is not a single shred of protected communication contained in this document and it has clearly been shared with non-lawyers and is merely a marketing plan.

Please accept this as a formal demand pursuant to the Court's Confidentiality Order, Plaintiffs hereby formally challenge the "Confidential" designation of Exhibit A of VNA's in camera submission (ECF No. 2885-2, PageID.94861).

This document does not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if the document was made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw the designation and to reproduce the document without it.

Further, a review of the document reveals that there is a myriad of other documents that have been generated and you should accept this as formal demand that all related documents referenced be turned over at this time as well. We intend to bring this issue to the court at the next conference.

Regards,

**Hunter Shkolnik**

Partner

Admitted in: NY, NJ, WI, SCOTUS, 6th Cir., 9th Cir.



(787) 493-5088 | [Hunter@nspriaw.com](mailto:Hunter@nspriaw.com)  
1302 Avenida Ponce de Leon, Santurce, Puerto Rico 00907

**Follow us on Social Media**



**\* Napoli Shkolnik is a registered tradename for NS PR Law Services, LLC. A Puerto Rican Limited Liability Corporation**

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

This e-mail and all other electronic (including voice) communications from the sender's firm are for informational purposes only. No such communication is intended by the sender to constitute either an electronic record or an electronic signature, or to constitute any agreement by the sender to conduct a transaction by electronic means. Any such intention or agreement is hereby expressly disclaimed unless otherwise specifically indicated.